

Response

to Main Document

Mary
Byrne/P2/R8/USEPA/US
07/11 01:17 PM

Subject:

Clarification of Issues

Response to:

SCI Systems Inc Plant 12 Fountain CO

Category:

Comments

A08-0007

AUG 23 2001

A signed application, by Mr. Steve Korn, Vice President and Plant Manager was faxed to Industrial Economics.

Clarification of location.

SCI has two facilities in Colorado, Plant 12 is located in Colorado Springs, CO and Plant 22 is located in Fountain, CO. Plant 12, Colorado Springs is relocating its entire operations to Plant 22 in Fountain (the facility has been sold). The Plant in Fountain is going to be renamed Plant 12. The move has begun and will be completed in the fall. The past aspects were Plant 12 in Colorado Springs. The future aspects are commitments for Plant 12 in Fountain.

Plant 12 in Colorado Springs has 1,700 employees, Plant 22 in Fountain has 200 employees. Plant 12 is ISO 14001 certified and will incorporate the operations of Plant 22, such as the cafeteria into its systems. Plant 12 manufactures the circuit boards, Plant 22 puts the final product together; desktop computers, notebooks, servers, and workstations.

Contact:

Ms. Mary Betsch, Facilities and Environmental Engineer, may be reached at 719-380-5901 at the Colorado Springs facility for the next 3 weeks and at 719-382-2000 at the Fountain facility after that.

Section C

Past Aspect #1, the aspect is VOC's.

Past Aspect #2, the waste was landfilled two years ago, the waste is being reclaimed for remanufacturing. The waste is being reclaimed rather than landfilled.

Future aspect #1, the aspect is HCFC

Future aspect #2, okay

Future aspect #3 - applicant is reviewing information

Future aspect #4 - applicant is reviewing information

Currently, the facility handles 61 hazardous products, 15 janitorial and 46 maintenance.

The level for achievement in the next three years is 41 hazardous products.

TO: Mary Byrne EPA	FROM: Mary Bicket	DATE: 1/1
FAX #: 303.312.6741	FAX #:	PHONE #: 380.5901
		PAGES INCLUDING THIS PAGE: 1

Section E

Application and Participation Statement

On behalf of SCI Systems, Inc.
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Program Description and in the Application Instructions;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Steve Korn 4/3/01

Printed Name/Title Mr. Steve Korn/Vice President and Plant Manager

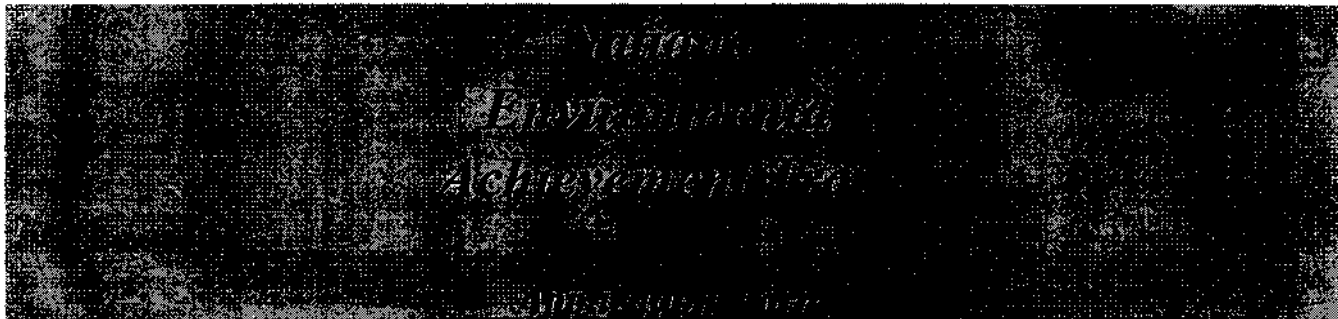
Facility Name SCI Systems, Inc.

Facility Street Address 702 Bandley Drive, Fountain, CO 80817

Facility ID Numbers EPA ID# C00000144436



A08-000704/09/01



SCI Systems, Inc. Plant 12

- located in CO Springs

Name of facility

Name of parent company (if any)

702 Bandley Drive

- Plant 22

Street address

Street address (continued)

Fountain, CO 80817

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Mary Betsch

Title Facilities and Environmental Engineer

Phone 719.382.2000

1- 719-380-5800 Main

Fax 719.382.2424

22 719-380-5901 Mary Betsch

E-mail Mary.Betsch@sci.com

Section

1 What do you do or make at your facility?

Printed Circuit Boards

*my circuit
boards?*

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3679

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

If yes, list in the right-hand column.

☒ Yes

☐ No

Plant 12 is closing and relocating with Plant 22

C00000144436 (Plant 12) and COD983780354
(Plant 22)

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

☐

Section

What do you need to know?

Facilities and Environmental Management System (EMS) Requirements

Management System (EMS) Requirements

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Facilities and Environmental Management System (EMS) Requirements

Management System (EMS) Requirements

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Management System (EMS) Requirements

1 Check yes if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

Yes

b. Planning

☒ Yes ✓

c. Implementation and operation

☒ Yes ✓

d. Checking and corrective action

☒ Yes ✓

e. Management review

☒ Yes ✓

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes ✓

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes ✓

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes ✓

If yes, what method of EMS assessment did you use?

☒ Self-assessment ✓

☒ GEMI

☒ Other ✓

☐ CEMP

☐

Third-party assessment

☒ ISO 14001 Certification ✓

☐ Other ☐

Section C

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Air Emissions	34	Tons/Month <i>VOC'S</i>	20	Tons/Month <i>VOC'S</i>
<p>i. How is the current level an improvement over the previous level?</p> <p>The State of Colorado air emissions permit (96EP438) limits for SCI Plant 12 is 42 Tons/year (on a 12-month rolling total). Although within the permit limits, a product switch to non-VOC flux has minimized waste flux and reduced air emissions.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The challenge was to find a VOC-free flux that could be left on the circuit board as a no-clean application, or removed with water. Once an alternative product was selected, the wave equipment was modified to accommodate the new product. The upgrade included replacing the infrared pre-heaters with convection pre-heaters to assist in the flux evaporation prior to entering the molten solder process. Additionally, the existing fluxers (foam, ultrasonic, and wave) were converted to more efficient spray fluxers significantly reducing the total amount of flux required.</p> <p>SCI's solder supplier provided Surface Insulation Resistance Testing (S.I.R.) to verify the resistance levels as acceptable. This test method is to characterize fluxes by determining the degradation of electrical insulation resistance of rigid printed wiring board specimens due to the deleterious effects of high humidity, heat conditions. SCI worked with its customers, providing sample lots, and finally received approval to move from the existing VOC fluxes to a Non-VOC flux. Six of the 8 wave solder lines were converted to VOC-free flux and the remaining 2 are expected to be converted to VOC-free flux in 2001.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Solid Waste	10,000 (Landfilled)	Pounds/Year	16,000 (Reclaimed)	Pounds/Year
<p>i. How is the current level an improvement over the previous level?</p> <p>Although waste generation increased due to production, the previously incinerated/landfilled material is reclaimed rather than landfilled.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Prior to 2001, all lead-bearing materials (wipes, solder paste cans, and swabs) were incinerated and landfilled. A take-back contract was established with the solder bar and solder paste supplier to pick up solder dross and lead-bearing materials while at the same time delivering product. The reclaimed material is remanufactured into non-electronics grade solder saving the company ~\$10,000/year. This initiative reduced the Plant's generator status from Large Quantity Generator to Small Quantity Generator. According to Table 1 of 6 CCR 1007-3 Section 261.2, the State of Colorado has determined the waste stream as "reclaimed by-products that exhibit a characteristic of hazardous waste" and can be managed on a bill of lading.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Air Emissions

☒ Yes ☐ No

☐ Option A:
Absolute value

☐ 14,020 Pounds/Year
(Quantity/Units)

☐ Option B:
In terms of
units of production

(Quantity/Units)

need specific aspect

HCFC

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

or output

Option A:
Absolute value

■ 0 Pounds/Year
(Quantity/Units)

■ Option B:
In terms of
units of production
or output

(Quantity/Units)

In 2001, a program will be established to evaluate alternative products for HCFC 141(b). Alternative products will be evaluated for performance and cost. If cost-effective, and reasonable performance, SCI will initiate use of the alternative. In 2003, the HCFC 141(b) will be phased out of production and SCI will move to one of the recommended alternatives.

HCFC

phased
out

Second aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

Recycled/Reused Materials Use

☒ Yes ☐ No

■ Option A:
Absolute value

■ 648,700 Pounds
Recycled/Year
(Quantity/Units)

■ Option B:
In terms of
units of production
or output

(Quantity/Units)

Option A:
Absolute value

■ 713,570 Pounds
Recycled/Year
(Quantity/Units)

■ Option B:
In terms of
units of production
or output

(Quantity/Units)

SCI will initiate new waste streams for recycling including crushed/punctured aerosol cans and plastics. Additionally, all employee training will be conducted in conjunction with an awareness program designed to promote recycling of all waste streams.

Third aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- e. How will you achieve this improvement?

Hazardous Materials Use

☒ Yes

☐ No

☐ Option A:
Absolute value

☐ Option B:
In terms of
units of production
or output

Option A:
Absolute value

☐ Option B:
In terms of
units of production
or output

Assess all MSDS's for Maintenance and Janitorial products and identify hazardous products. For the hazardous products onsite, evaluate alternative, non-hazardous substitutes. Additionally, determine 1 product for each application to reduce/control the number of products onsite.

Initiate a procedure to evaluate all new chemicals introduced onsite.

Maintenance

(Quantity/Units)

61
~~37~~ Hazardous Products
(Quantity/Units)

(Quantity/Units)

41
~~27~~ Hazardous Products
(Quantity/Units)

*tons
pds
or drum*
*looking
at
consolidating
replace
w/ alternatives*

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Hazardous Solid Waste

☒ Yes

☐ No

☐ Option A:
Absolute value

☐ Option B:
In terms of
units of production
or output

☒ 46,355 Pounds/Year
(Quantity/Units)

(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A:
Absolute value

where did this # come from?
■ 41,700 Pounds/Year
(Quantity/Units)

■ Option B:
In terms of
units of production
or output

*anticipates
amt -
may be
more*
(Quantity/Units)

e. How will you achieve this improvement?

Conduct a Pollution Prevention Opportunity Assessment on the Wave process. Upon completion of the assessment, evaluate pollution prevention opportunities for implementation of cost effective and environmentally sound solutions.

Section

1 How do you identify and respond to community concerns?

SCI has procedures in place to respond to public inquiries related to the environment. An External Communication Log is maintained in the Environmental Health and Safety Office to ensure a response to all communication from interested parties.

2 How do you inform community members of important matters that affect them?

4:01 PM Press releases are prepared informing community members of environmental issues affecting them

3 How will you make the Achievement Track Annual Performance Report available to the public?

✓ Website ☒ www.sci.com

Newspaper

✓ ☒ Open Houses

✓ ☒ Other

The City of Colorado Springs, CO and the county of El Paso are notified as to SARA: (Superfund Amendments & Reauthorization Act) via Title III reporting & the Uniform Emergency Response Plan

To ensure effective communication w/interested parties, SCI prepares regulatory filings (such as permits, applications & reports) & customer surveys.

4 Are there any ongoing citizen suits against your facility?

Yes

☒ No

If yes, describe briefly in the right-hand column.

■

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Pikes Peak Greenway Committee and Great Outdoors Colorado	Mr. Lee Trovas	719.578.6412
State/Local Regulator	Colorado Springs Utilities	Mr. Robert Mackey	719.668.4356
Other community/local reference	Health and Environmental Technology	Mr. Robert Rodosevich	719.593.2862

Section

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[my facility],

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I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Attached

Printed Name/Title Mr. Steve Korn/Vice President and Plant Manager

Facility Name SCI Systems, Inc.

Facility Street Address 702 Bandley Drive, Fountain, CO 80817

Facility ID Numbers EPA ID# C00000144436

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Air Pollution Regulations

Check All That Apply

- ☒ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☐ 3. General Emission Standards, Prohibitions and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☒ 8. Sampling, Testing and Reporting
- ☒ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☐ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ Characteristic Waste
 - ☒ Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ Manifesting
 - ☐ - Pre-transport requirements
 - ☒ Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping

- - Hazardous waste discharges
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - - General facility standards
 - - Preparedness and prevention
 - - Contingency plan and emergency procedures
 - - Manifest system, Record keeping and reporting
 - - Groundwater protection
 - - Financial requirements
 - - Use and management of containers
 - - Tanks
 - - Waste piles
 - - Land treatment
 - - Incinerators
- 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)
- 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
 -

Hazardous Materials Management

Check All That Apply

- 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ✓ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ✓ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
 -

Solid Waste Management

Check All That Apply

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- 2. Permit Requirements for Solid Waste Disposal Facilities
- 3. Installation of Systems of Refuse Disposal
- 4. Solid Waste Storage and Removal Requirements
- 5. Disposal Requirements for Special Wastes

- 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

■

Water Pollution Control Requirements

Check All That Apply

- 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- 2. Designation of Hazardous Substances (40 CFR 116)
- 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- 4. NPDES Permit Requirements (40 CFR 122)
- 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW ■
ID # of POTW
- 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- 10. Water Quality Standards
- 11. Effluent Limitations for Direct Dischargers
- 12. Permit Monitoring/Reporting Requirements
- 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- 14. Collection, Handling, and Processing of Sewage Sludge
- 15. Oil Discharge Containment, Control and Cleanup
- 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☒ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
■ State of Colorado Stormwater No Exposure Certification for Exclusion from CDPS Stormwater Permitting

Drinking Water Regulations

Check All That Apply

- 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- 2. National Primary Drinking Water Standards (40 CFR 141)
- 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)

- 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- 5. Underground Injection Control Requirements
- 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
 -

Toxic Substances

Check All That Apply

- 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- 2. Import and Export of Chemicals (40 CFR 707)
- 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- 4. Chemical Information Rules (40 CFR 712)
- 5. Health and Safety Data Reporting (40 CFR 716)
- 6. Pre-Manufacture Notifications (40 CFR 720)
- 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)
- 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
 -

Pesticide Regulations

Check All That Apply

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- 3. Certification of Pesticide Applications (40 CFR 171)
- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides
- 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
 -

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (Please identify)



2. RCRA Corrective Action



The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
4th Floor
Cambridge, MA 02140

3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above



Facility Name SCI Systems, Inc.
Facility Location: 702 Bandlely Drive
Facility ID Number(s): EPA ID# C00000144436